



# CALIFORNIA URBAN WATER AGENCIES

June 5, 2009

Mr. Paul Dabbs  
Strategic Water Planning  
Statewide Integrated Water Management  
California Department of Water Resources  
PO Box 942836  
Sacramento, CA 94236-0001

Subject: Comments on Public Review Draft of the California Water Plan Update 2009

Dear Mr. Dabbs:

California Urban Water Agencies (CUWA) is pleased to submit comments on the Public Review Draft of the California Water Plan Update 2009. Information from the 2005 Update was used by many organizations and in many processes and we expect the same for the 2009 Update. CUWA urges the Department of Water Resources (DWR) to respond to comments on the Public Review Draft and release a revised draft for public comment. The Public Review Draft has a tremendous amount of missing information and placeholders so it is not possible to conduct a thorough review of the report.

I have served as CUWA's representative on the Advisory Committee for this plan and have witnessed firsthand the dedication and leadership shown by the Department of Water Resources (DWR) staff involved in preparing this plan. Although CUWA and several other water associations were represented on the Advisory Committee, many of our member agencies felt that their level of engagement was limited by the decision to not have individual water agencies represented on the Advisory Committee. We urge you to reconsider this when you start the process for the next Water Plan Update.

CUWA urges you to give more consideration to the Colorado River in the Water Plan. The Colorado River provides California with 4.4 million acre-feet of water per year. The Water Plan should provide strategies for optimizing this water supply.

Our member agencies who participated in developing the South Coast Regional Report felt that this was a valuable process that resulted in a Regional Report that accurately depicts the South Coast water supply situation. CUWA thanks DWR for allowing the local agencies to develop the report and urges you to consider this again for the next Water Plan Update.

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San Francisco Public Utilities Commission  
Alameda County Water District  
San Diego County Water Authority  
Metropolitan Water District of Southern California

Santa Clara Valley Water District  
City of San Diego Water Department

Zone 7 Water Agency  
Contra Costa Water District  
East Bay Municipal Utility District  
Los Angeles Department of Water & Power

## VOLUME 1 THE STRATEGIC PLAN

### Chapter 5 Managing an Uncertain Future

This chapter is largely incomplete, containing a description of the scenarios but no information on the regional demands and response packages. CUWA requests that this chapter be available for review so that we can submit more detailed comments when the chapter is completed.

(B)  
v/ch 5

Page 5-13, Scenario 1 - Current Trends – The description of this scenario needs to be refined if it is indeed supposed to reflect current trends. The description of conservation (Californians have continued to take advantage of existing rebate incentive programs to improve water and energy conservation) falls far short of what is actually happening. In fact, other DWR publications have acknowledged that California is a leader on water and energy use efficiency among the states. Also, the Current Trends scenario describes the state legislature and state agencies as only reacting to crises. On the contrary, the state legislature has proposed several hundred water bills over recent years in an attempt to address various aspects of water management and planning and state agencies have increased coordination and collaboration to lessen piecemeal regulation. The Current Trends scenario should indicate that the state legislature is concerned with water issues and there is increasing collaboration among state and local agencies, extending beyond those with primary jurisdictions related to water.

### Chapter 7 Implementation Plan

(C)  
v/ch 7

Under each objective in Chapter 7 Implementation Plan, there is a list of related actions that are at times very specific. CUWA supports the actions to be specific where they have been defined by legislation, regulations, or results of stakeholder involvement. It is unclear how the lists of actions have been compiled in the current descriptions. Many of the actions bear the wording “By year xxxx, local/regional/urban water management plans **should** .... or use/produce xxxx acre-feet.” It is good to have specific targets related to timing or quantities after a consensus process with stakeholders and parties that would implement these actions. However, it is inappropriate and meaningless for DWR to unilaterally set specific targets when it has no authority to implement.

It is also unclear how these related actions relate to the recommendations for each resource management strategy. For example, the related actions under Objective 2 – Use water more efficiently are not consistent with many of the recommendations listed under the Urban Water Use Efficiency resource management strategy described in Volume 2.

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## VOLUME 2 RESOURCE MANAGEMENT STRATEGIES

There are many statements in this volume that need to be referenced. The "Selected References" presented at the end of each section are inadequate and do not allow the reader to understand the source of much of the information presented in the chapters.

(D)  
v2  
This volume contains hundreds of recommendations, many of which are not assigned to any entity responsible for implementing them. Each recommendation should start with the entity that is responsible for implementing it. If DWR is responsible, the recommendation should state "DWR will do.....", if DWR is recommending that local water agencies implement the recommendation, the recommendation should state "DWR recommends that local agencies should do ....."

### Chapter 1 Introduction

(E)  
v2 ch1  
Table 1-1 – There are more benefits than currently shown for some strategies. Agricultural water use efficiency, recycled municipal water, and urban runoff management all improve water quality and have environmental benefits.

### Chapter 3 Urban Water Use Efficiency

The entire section on Challenges to California's Water Supply Security needs to be moved to Chapter 1 Introduction. It explains the need for a diverse water supply portfolio. California's Plan for Water Supply Security involves far more than using water efficiently. The water use efficiency actions should be discussed in the context of storage, conveyance, etc.

(F)  
v2 ch3  
Similarly the Climate Change Strategy section goes well beyond water use efficiency. There is a lot of information on agricultural use of water and greenhouse gas (GHG) emissions in this section that have nothing to do with urban water use efficiency.

This chapter needs a discussion on demand hardening, or when options available for reducing water use are narrowed as the customer base is saturated with hardware conversions and efficient water usage patterns prevail. Demand hardening is an important consideration in responding to future supply scarcities and should receive greater attention in the Water Plan.

This chapter also needs more discussion about how the indoor conservation measures are nearing saturation and the focus of most water agencies is shifting to outdoor water use.

Page 3-2 - The information on court restrictions needs to be updated to reflect the biological opinions that have been released.

Page 3-3 -- The drought discussion needs to be updated to include 2009 information.

Page 3-4 - The 20x2020 discussion needs to be updated.

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Page 3-7 – There are different and conflicting goals for water use efficiency that conflict with each other and various estimates of how much water can be saved, and how much grant funding is assumed. The basis for these numbers needs to be provided. There needs to be some discussion about whether these levels of grant funding have been achieved (\$25 million in 2008) and whether the future projections of funding are realistic given the state's current fiscal situation.

Page 3-10 – The bulleted list under the heading Drought preparedness applies to all resource management strategies

Page 3-11, Dry Year Preparedness – This paragraph seems misplaced. It is a general discussion of the benefits of water use efficiency, not a description of how water use efficiency benefits us in dry years and thus should be included on page 3-10. An important sentence that was included

in the 2005 Update but dropped from this paragraph should be added back in: *"Translating water use efficiency savings into specific water supply reliability benefits will depend on the water system involved, the level of savings, and the variations in water savings from one year to the next as well as throughout the year."*

Page 3-14, Implement climate change strategy – how is this a financial benefit of water use efficiency?

Page 3-15 – There are different goals for water use efficiency that conflict with each other.

Page 3-17, Responding to the Funding Challenge – These are a few examples of how individual agencies fund conservation activities. It does not address the larger issue of a sustainable funding source for conservation activities.

Page 3-19, first full paragraph – The discussion of metering needs to be put in context. What percent of the state's population is not metered? The legislative mandate to meter the unmetered areas and the deadlines for doing so should be discussed. This information is presented in Chapter 14 on page 14-16. It should be moved to this chapter.

Page 3-19, Education and Motivation – Discuss Save Our Water and acknowledge that many agencies have local and regional public education programs.

Page 3-19 to 3-20, Innovation – This section contains a hodge-podge of conservation measures, some discussed at length and some just listed. The measures should be arranged by sector and each discussed briefly. There are important measures that are not listed (e.g. replacing turf with California friendly plants).

Page 3-21, Recommendations – This is a long list of recommendations, taken largely from the 2005 Update with some new recommendations included. There should be some discussion as to why none of these recommendations were implemented between 2005 and 2009.

6  
v2 ch 3

The recommendations should be organized similarly to the list in the Agricultural Water Use Efficiency chapter.

- Recommendation 1 - The final list of 20x2020 recommendations should be listed. CUWA does not agree with all of them (The CUWA comment letter is attached).
- Recommendation 2 – DWR Legislation needs to be explained.
- Recommendations 6 and 16 should be combined.
- Recommendation 7 - The Sustainability actions don't really belong as recommendations under water use efficiency.
- Recommendation 9 is missing the specific items to be addressed.
- Recommendation 10 on metering contains a bullet on retrofit on resale that is misplaced.
- Recommendation 17 is already covered in Recommendation 8

Page 3-25, Selected References – The reference list is incomplete and some of the references are not listed correctly.

#### **Chapter 4 – Conveyance – Delta**

(H)  
v2 ch 4  
The conveyance recommendations from Delta Vision, the Bay Delta Conservation Plan, and the Public Policy Institute of California should be described in this chapter. DWR should commit in the Recommendations section to implementing the conveyance related recommendations of the BDCP and the Delta Vision Strategic Plan.

The near-term actions, such as the Two-Gate Operable Barrier project and the Three Mile Slough project, that will allow better conveyance of water through the Delta in the near-term while the longer-term strategy is being developed and implemented, should be described. There should be a recommendation to fast-track these projects.

Page 4-3, second paragraph – Call out water quality improvement as well as supply reliability, as in “It is important to recognize that, in some cases, improving water supply reliability through operational flexibility or improving water quality is just as valuable as increasing overall supply.”

#### **Chapter 5 – Conveyance – Regional/Local**

(1)  
v2 ch 5  
There is a lot of redundancy between Chapters 4 and 5 with many pages containing the same language. Chapter 5 contains a lot of discussion of Delta conveyance that is covered in Chapter 4. It is unclear as to why conveyance was separated into two chapters for the 2009 Update.

#### **Chapter 8 – Conjunctive Management and Groundwater Storage**

(S)  
v2 ch 8  
It is our understanding that this chapter is currently being rewritten. CUWA requests an additional opportunity to review the revised chapter.

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Page 8-11, Infrastructure and Operational Constraints – Add a discussion about the need to coordinate infrastructure and operations for flood control and recharge of storm flows for conjunctive use. In Southern California, there is considerable opportunity to enhance groundwater recharge of local runoff by improved coordination of these efforts.

Page 8-13, Recommendations to Improve Conjunctive Management and Groundwater Storage – Add two additional recommendations:

- Encourage coordination of groundwater recharge and flood control activities to enhance recharge of storm flows. Provide a source of funds for studies jointly sponsored by cooperating groundwater and flood control agencies to identify additional opportunities for recharge and needs for advancing those opportunities.
- Identify and evaluate opportunities to reduce runoff and increase recharge on residential, school, park, and other unpaved areas. Review applicable city and county ordinances and building codes.

## **Chapter 9 – Desalination**

Page 9-5, Potential Costs of Desalination – Provide references for the cost estimates.

Page 9-6, Major Issues Facing Desalination – Add a discussion of the water quality issues associated with blending desalinated water with other surface water supplies in the distribution system. Desalinated water contains high bromide concentrations which, when combined with surface waters containing organic carbon can form disinfection byproducts. Desalinated water may also be corrosive.

Page 9-8, Recommendations to Facilitate Desalination in California - It is unclear why conservation and recycling were specifically mentioned. Desalination should be considered in water supply portfolios that contain many resource management strategies.

## **Chapter 11 Recycled Municipal Water**

This chapter should provide a status update on the recommendations from the Recycled Water Task Force and a plan for implementing the recommendations that have not been completed.

Page 11-4, first paragraph – The discussion needs to be updated to reflect the adoption of the Recycled Water Policy by the State Water Resources Control Board and the current status of the general permit for landscape irrigation.

Page 11-11, Recommendations to Increase Recycled Water Use – Add a recommendation that salt management plans be funded so they can be completed quickly and will increase potential for recycling projects.

Page 11-11, Recommendations to Increase Recycled Water Use – Add a recommendation that the state convene an expert panel to develop a strategy for addressing the issues associated with direct potable reuse.

#### Chapter 14 – Drinking Water Treatment and Distribution

This chapter barely mentions the need to protect source water quality as the first critical barrier in the multiple barrier approach to providing safe drinking water. A key issue that is not addressed is the increasing difficulty of protecting source water quality as the population of the state increases resulting in increased discharge of wastewater and urban runoff into surface water supplies. Another major issue is that some drinking water contaminants (organic carbon, nutrients, pathogens such as *Giardia* and *Cryptosporidium*) are not currently regulated by the Regional Boards in Basin Plans so there are no requirements for dischargers to control these contaminants. CUWA will be pleased to work with DWR staff to provide more information on these issues.

Page 14-3, fourth paragraph – Point out that bottled water use contributes to GHG emissions.

Page 14-6, second full paragraph – Balancing the inactivation and removal of pathogens through disinfection with the production of disinfection byproducts such as trihalomethanes and haloacetic acids is a better example of how water agencies have to optimize treatment to meet many regulatory requirements.

Page 14-16, Efficient Use of Water – This entire section belongs in Chapter 3. The efficient use of water is not a major issue facing drinking water treatment and distribution.

Page 14-20, Recommendations for the Future – Recommendations 8, 9, 10, 11, and 12 should be moved to Chapter 3 Urban Water Use Efficiency.

#### Chapter 15 – Groundwater Remediation

Table 15-1 and Table 15-2 – These two tables should be combined to show the treatment techniques that are used to remove each of the contaminants.

Table 15-3 – Perchlorate is currently listed as an unregulated contaminant. It should be moved to regulated inorganic chemicals.

Page 15-7, Potential Benefits of Groundwater Remediation in California – Another benefit that should be listed is the ability to use an aquifer for storage of excess surface water supplies after the groundwater has been remediated.

## Chapter 16 – Matching Quality to Water Use

A multi-year stakeholder-driven effort to develop a Central Valley Drinking Water Policy should be described in this section and a recommendation should be added that directs the Central Valley Regional Water Board to develop this policy by 2010.

Page 16-2, Matching Quality to Drinking Water Use – This paragraph should contain a discussion of the multi-barrier principle as it relates to source water protection to provide the highest quality source water available.

Page 16-5, Energy and Climate Change – Water treatment is only one cause of GHG emissions. Pumping water is a major contributor of GHG emissions if it has to be transported long distances.

Page 16-7, last paragraph – The Central Valley Drinking Water Policy effort is designed to address the lack of objectives for key drinking water constituents. This effort should be briefly described.

## Chapter 17 – Pollution Prevention from Nonpoint Sources

It is unclear why this chapter is dedicated to nonpoint source pollution prevention. There is still a need to address point source pollution prevention, particularly for several key drinking water contaminants that are not currently regulated by the State and Regional Water Boards. CUWA requests that this chapter be expanded to include point source pollutant prevention.

One of the major issues that is not addressed in this chapter is the impact of population growth on water quality. As the population of the state increases, there will be more diversions from streams to provide potable water and more dischargers of wastewater and urban runoff. This has the potential to lead to further degradation of water quality unless more rigorous source water protection programs are put in place.

Page 17-4, Groundwater Quality – There are numerous contaminants, in addition to nitrate and salinity, that impact groundwater quality that should at least be briefly discussed in this section.

Page 17-5, Land Use Categories and Pollution Prevention – This section should also address point source pollution prevention.

Page 17-6, Agriculture – Agriculture is a source of organic carbon, particularly in the Delta.

Page 17-6, Urban – Urban runoff is a source of organic carbon and pathogens such as *Giardia* and *Cryptosporidium*.

Page 17-10, Natural Impacts and Legacy Pollutants – While there are natural sources of organic carbon, agriculture drainage, urban runoff, and wastewater discharges contain much higher concentrations of organic carbon than occurs in natural runoff. The Organic Carbon Conceptual

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Model developed for the Central Valley Regional Board as part of the Central Valley Drinking Water Policy Project is a good source of information on these anthropogenic sources of organic carbon. Organic carbon and bromide should not be discussed under the heading of Natural Impacts and Legacy Pollutants. CUWA suggests that a new section be created that specifically discusses drinking water contaminants that are not currently regulated (organic carbon, bromide, nutrients, and pathogens).

Page 17-11, last sentence of first paragraph – This statement “Moreover, serving drinking water to Californians is an obligation of cities, water districts, and private water companies that were generally not formed in any comprehensive pattern.” is unclear and confusing and has no relevance to pollution prevention.

Page 17-15, last sentence of Recommendation 3 – This recommendation needs to be clarified to explain how current drinking water monitoring is deemed by DWR to be inadequate.

CUWA appreciates the opportunity to submit these comments and we look forward to reviewing a more complete draft report in the near future. Please call me if you have any questions on our comments or would like assistance from us in developing information to include in the Water Plan.

Sincerely,



Elaine M. Archibald  
Executive Director